

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,
as representative of
THE COMMONWEALTH OF PUERTO
RICO, *et al.*,
Debtors.

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**URGENT MOTION SUBMITTING ELEVEN (11) CERTIFIED TRANSLATIONS IN
CONNECTION WITH *RAMHIL DEVELOPERS INC.'s OBJECTION TO DOCKET NO.
19353 AND INFORMING CURE AMOUNTS FOR EXECUTORY CONTRACTS OR
UNEXPIRED LEASES TO BE ASSUMED PURSUANT TO TITLE III PLAN OF
ADJUSTMENT***

AND

**UNOPPOSED REQUEST OF TIME EXTENSION TO FILE A PENDING
TRANSLATION**

To the Honorable United States District Court Judge Laura Taylor Swain:

COMES NOW Ramhil Developers, Inc., represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. On January 18th, 2022, *Ramhil filed an Objection to Docket No. 19353 and Informing Cure Amounts for Executory Contracts or Unexpired Leases to be Assumed Pursuant to Title III Plan of Adjustment* (the "Objection to Cure Amounts"). (ECF No. 19807).

2. Pursuant to the filed motion, Ramhil requested leave to file twelve (12) Exhibits in their original Spanish language and to subsequently submit certified translations within the next thirty (30) days in order to comply with the applicable legal requirements. (ECF No. 19808).

3. On January 20, 2022, this Honorable Court granted until February 17, 2022, for Ramhil to submit certified translations of the exhibits. (ECF No. 19843).

4. Ramhil hereby respectfully submits eleven (11) out of twelve (12) certified translation of the exhibits to the Objection to Cure Amounts. Specifically, Ramhil submits the following English translations:

- a. Exhibit #2, Development Agreement
- b. Exhibit #4, Ramhil's Proposal
- c. Exhibit #6, Infracity Report dated March 11, 2014
- d. Exhibit #7, Infracity Report dated January 28, 2014
- e. Exhibit #8, Parking Rent Invoice (Post-Petition)
- f. Exhibit #9, Parking Rent Invoice (Pre-Petition)
- g. Exhibit #10, OCA Letter to Ramhil dated September 19, 2012
- h. Exhibit #11, OCA Letter to Ramhil dated February 15, 2013
- i. Exhibit #12, Substantial Completion Certificate and Use Permit
- j. Exhibit #13, LED Lamps Pre-Petition Invoice
- k. Exhibit #14, Change Orders and Letter of Approval

5. Despite the effort-and for reasons outside of Ramhil's control- the group in charge of the translations will not be able to complete on time one (1) of the translations, specifically the Exhibit #1, Lease Agreement.

6. In light of the foregoing, Ramhil respectfully requests this Court to take notice of the aforementioned and allow to file the translation of Exhibit #1, Lease Agreement, on or before February 22, 2022, at 5:00 p.m. (Atlantic Standard Time). The undersigned conferred Debtor's counselors, and they agreed to the requested time extension.

7. Pursuant to Local Rule 9013-1 and paragraph I.H of the Third Amended Case Management Procedures, Ramhil hereby certifies that it has (i) carefully examined the matter and concluded that there is a true need for an urgent motion; (ii) not created the urgency through any

lack of due diligence; (iii) made a bona fide effort to resolve the matter without an urgent motion; and (iv) made reasonable, good-faith communications with each other in an effort to resolve or narrow the issues that are being brought to the Court, and all have agreed to filing the Urgent Motion.

WHEREFORE, Ramhil respectfully requests that this Court take notice of the above, deem the Order as complied with, and accept the attached certified translations of the Exhibits to the Objection to Cure Amounts. Ramhil further requests a brief time extension until **February 22, 2022, at 5:00 p.m. (Atlantic Standard Time)**, to file the translation of Exhibit #1, Lease Agreement.

Certificate of Service: I hereby certify that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM-ECF system which will send notification of such filing to the CM/ECF participants and parties in interest as per master address list.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of February. 2022.

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